

BELLE FOURCHE PIPELINE COMPANY

895 WEST RIVER CROSS ROAD

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December 18, 2002

Rebecca Kane
Environmental Protection Agency
Office of Enforcement and Compliance Assurance
MC 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Enforcement and Compliance History Online (ECHO) Comments

Dear Ms. Kane:

Belle Fourche Pipeline Company (BFPL) has reviewed the new Enforcement and Compliance History Online (ECHO) website and offers the following comments based on questions that were included in the 11/20/02 federal register notice:

(1) Does the site provide meaningful and useful information about the compliance and enforcement program?

BFPL questions the need for such a database as all of the information is readily already available by directly contacting the appropriate state or federal agency. The few tangible benefits to the limited universe of users that will access the database do not, in our opinion, justify the significant resources that will be expended to further develop, support and continually update the database. Additionally, the database did not include a large number of Wyoming NPDES permits that have been issued by the WDEQ-Water Quality Division. This appears to be a large informational gap in the database.

(2) Is the site easy to navigate?

BFPL found the website easy to navigate and the applicable databases easy to search. However, several initial attempts to perform a search function were unsuccessful. After contacting the ECHO technical service representative, we were informed a server was down and the cause of our search errors. Once the server was placed back on-line, we were able to complete our search exercise.

(3) What additional features, content and/or modifications would improve the site?

It would be useful to include for a facility, the date of the last information update or the frequency of updates that are input into the database. It is suggested that at a minimum, all records of the database should be updated semi-annually.

(4) For members of the regulated community: (A) Were your facility reports accurate?; (B) If you did need to submit an online error report, was the error reporting process easy to use?

A review of the three BFPL sites that are entered in the database identified one facility that should not have been included as the Operating Permit had been rescinded by the state regulatory agency in 2000. BFPL used the "error correction process" that is available to users to correct this inaccuracy. BFPL found the correction process to be simple to complete, and one day following submission of the error entry received notification from ECHO the error had been verified and corrected.

Thank you for the opportunity to provide comments.

Sincerely,


Renee C. Taylor
Environmental Coordinator